

## **EXHIBIT 4**

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## (Proposed Confidentiality Agreement)

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re

## THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO,

## Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

# **CLAIMS CONFIDENTIALITY AGREEMENT**

This Agreement (“Agreement”) is entered into as of .

14 The undersigned (the “Recipient”) is a Permitted Party pursuant to the Order Fixing Time  
15 for Filing Proofs of Claims; Approving Proof of Claim Forms; Providing Confidentiality  
16 Protocols; and Approving Form and Manner of Notice (the “Order”) [Docket No. \_\_] on  
17 \_\_\_\_\_, 2023 by the United States Bankruptcy Court for the Northern District of California  
18 (the “Court”) in Case No. 23-30564, In Re: The Roman Catholic Archbishop of San Francisco (the  
19 “Case”).

20       **WHEREAS**, the Recipient requests access to confidential Survivor Proof of Claim Forms<sup>1</sup>  
21 filed in the Case after execution of this Agreement pursuant to and in accordance with the terms of  
22 the Order;

23       **WHEREAS**, Recipient agrees to keep the information provided in any and all Survivor  
24 Proof of Claim Forms confidential pursuant to and in accordance with the terms of the Order and  
25 this Agreement; and

<sup>1</sup> Capitalized terms used but not defined herein shall have the meaning and definitions ascribed to them in the Order.

1                   **WHEREAS**, with the exception of the parties identified in paragraph 15(d) of the Order,  
2 access to the Survivor Proof of Claim Forms extends only to the natural person who executes this  
3 Agreement. A separate confidentially agreement must be signed by each natural person who seeks  
4 access to the Survivor Proof of Claim Forms on behalf of a Permitted Party.

5                   **NOW, THEREFORE, IT IS AGREED AS FOLLOWS:**

6                   1.       Recipient agrees to keep the information provided in the Survivor Proof of  
7                   Claim Forms confidential pursuant to and in accordance with the terms of the Order;

8                   2.       Recipient agrees to not distribute any Survivor Proof of Claim Forms or  
9                   information provided in the Proof of Claim Forms in violation of the Confidentiality  
10                   Protocols in the Order.

11                   3.       Recipient agrees that only the natural person who executes this Agreement  
12                   will have access to the Survivor Proof of Claim Forms unless Recipient is a Permitted Party  
13                   pursuant to paragraph 15(d) of the Order.

14                   4.       Recipient will only communicate information from the confidential Survivor  
15                   Proof of Claim Forms with other Permitted Parties who have executed a confidentiality  
16                   agreement pursuant to the Order.

17                   5.       Recipient consents to the jurisdiction of the Court to adjudicate any violation  
18                   of this Agreement or the Order.

19                   6.       Recipient shall promptly report any disclosure of information from a  
20                   confidential Survivor Claim to the Debtor and any appointed Committee, and shall cooperate  
21                   with efforts to recover the information and/or mitigate the effects of the disclosure.

22  
23                   Dated: \_\_\_\_\_, 2023.

24                   Signature: \_\_\_\_\_

25                   Print Name: \_\_\_\_\_

26                   Name of Party Represented (if any): \_\_\_\_\_